



F. WILLIAM MAHLEY
713-951-5633
bill.mahley@strasburger.com

December 23, 2005

VIA HAND DELIVERY

Ms. Barbara A. Nann
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

VIA HAND DELIVERY

Mr. Gary G. Miller, Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

**RE: Site Access for the Gulfco Marine Maintenance, Inc. Superfund Site in
Freeport, Texas (the "Site"); CERCLA Docket No. 06-05-05**

Dear Ms. Nann and Mr. Miller:

Please accept this letter as a status update on Respondents' efforts to obtain the necessary access under Paragraph 72 of the Modified Unilateral Administrative Order for Remedial Investigation/Feasibility Study ("UAO") for this Site and request for additional time to complete this task.

To date, we have secured access to the following properties: Lot 54, Lot 56, Lot 59, Lot 74 and Lot 75. Respondents are awaiting revisions to a proposed access agreement for Lots 72 & 73, which are owned by the Brazos River Harbor Navigational District, from the owner's outside counsel. Regarding Lots 76 & 77, Respondents have secured consent to access from eight out of nine parties with ownership interest in this property. The remaining owner, Mr. Charles L. Stevens, has yet to respond to our requests for access. For your reference, we have enclosed a map of the Site and surrounding properties.

Strasburger & Price, LLP

901 Main Street, Suite 4400 • Dallas, Texas 75202.3794 • 214.651.4300 tel • 214.651.4330 fax • www.strasburger.com

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We will continue to pursue our outstanding requests for access agreements from the parties listed above and apprise you of our progress. We expect to be able to secure the necessary access from the remaining parties within the next thirty (30) days. Therefore, we request an additional time extension until January 30, 2006, to complete this task.

Thank you for your attention to this matter. Please let us know if EPA prefers another course of action be taken with respect to securing the necessary access.

Sincerely,


F. William Mahley

FWM/nts

cc: Pamela Travis, EPA Region 6 – Via Hand Delivery
Brent Murray, for Chromalloy American Corp. – Via Email
Jim Morriss, Thompson & Knight, LLP – Via Email
Scott Magelssen, The Dow Chemical Company – Via Email
Allen Daniels, LDL Coastal, LP – Via Email
Eric Pastor, Pastor, Behling & Wheeler, LLC – Via Email

